

## DEPARTMENT OF SOCIAL SERVICES

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June 25, 1979

ALL-COUNTY LETTER NO. 79-37

TO: ALL COUNTY WELFARE DIRECTORS  
FISCAL OFFICERS  
ADMINISTRATIVE SERVICE OFFICERS  
COUNTY AUDITORS

SUBJECT: STAFF DEVELOPMENT

REFERENCE:

Recently, the Department of Health, Education, and Welfare (DHEW) withheld approval of California's Cost Allocation Plan on the basis that the staff development instructions provided to counties in the past lacked sufficient clarity to ensure that costs were claimed in accordance with existing federal regulations. As a result of a recent meeting with DHEW, we have reached concurrence regarding fiscal limitations applicable to county staff development administrative costs.

Effective July 1, 1979, both the administrative expense claim and the Staff Development Time Study, the DFA 50, will be changed to reflect the understanding we have reached. Therefore, we have attached revised time study and claiming instructions for the staff development area. This attachment is divided into three parts: Part I defines those costs which may be charged as staff development costs and where they should be charged on the administrative expense claim; Part II provides specific time study instructions for the Staff Development Time Study, the DFA 50; and Part III provides instructions regarding the changes in the process of allocating staff development costs to proper funding source.

While these changes are numerous, we feel that they meet the intent of federal regulations yet also reduce the differences between allowable staff development costs under Titles IV-A and XX to the maximum extent possible. Most importantly, these changes recognize the differences in staff development efforts that are necessitated by county size, i.e., part-time staff development trainers.

Because of the complexity and the lack of clarity of this area, this department will continue to pursue staff development issues with DHEW to ensure that legitimate county staff development costs receive proper funding.

Should you have any questions, please contact Mark Salomon or Patrick Fitzgerald at 916/445-7046.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. E. Reich", written over the typed name.

R. E. REICH  
Deputy Director  
Administration Division

Attachment

cc: CWDA

PART I: STAFF DEVELOPMENT - ALLOWABLE COSTS/CLAIMING AREAS

A. PERSONAL SERVICES - DFA 325.2, GROUP IV (1)

1. General Requirements - In order for any portion of any person's salary/benefits to be charged to staff development (ex. trainees), the person:

- a. must be under the supervision of a full-time staff development officer while performing staff development activities. Those counties that do not have a full-time staff development officer may, for the purposes of charging time/costs, consider part-time staff to be supervised by the Chief, DSS Training Bureau and therefore charge time/costs to staff development provided the training is developed and conducted in accordance with MPP Divisions 14 and 34, and,
- b. must be detailed to the staff development office on an on-going basis with the continuing responsibility to perform specific staff development activities. While the assignment to the staff development office can be made on a less than full-time basis, the responsibility for performing staff development activities must last for more than four consecutive weeks, e.g., must be part of a person's normal job function/description for more than four weeks.

2. Allowable Costs/Specific Limitations

a. Salaries of Trainers are Allowable for:

- 1) The Time Spent Actually Providing Training. That portion of a bonafide staff development trainer's salary that corresponds with the time spent actually providing training is allowable.
- 2) The Time Spent By Trainers On Staff Development Administrative Activities. That portion of a bonafide staff development trainer's salary corresponding to time spent on staff development activities other than training, e.g., planning, needs assessment, course preparation, monitoring, evaluation, staff development budget, etc, is allowable.

NOTE:

That portion of a staff development trainer's salary which corresponds with the time spent on non-staff development activities, e.g., casework, should not be charged to staff development. Rather, this cost should be charged to the appropriate non-staff development salary area.

- b. The Salaries of Staff Development First-line Training Supervisors are Allowable for:

- 1) The Time Spent Supervising Staff Development Trainers. That portion of a first-line supervisor's salary which corresponds to the time spent directly supervising staff development trainers, is an allowable staff development cost.
- 2) The Time Spent by First-line Staff Development Supervisors on Staff Development Administrative Activities. That portion of a first-line supervisor's salary which corresponds to the time spent on staff development administrative activities, e.g., planning, needs assessment, course design, monitoring, evaluation, staff development budget, etc., is an allowable staff development cost.

NOTE:

That portion of a first-line staff development supervisor's salary which corresponds with time spent on non-staff development activities, e.g., casework supervision, should not be charged to staff development. Rather, this cost should be charged to the appropriate non-staff development salary area.

c. Salaries of Support Staff are Allowable for:

- 1) The Time Spent on Non-Supervisory Staff Development Administrative Activities. That portion of the salary which corresponds with the time spent by administrative staff on staff development administrative activities, e.g., planning, needs assessment, course design, evaluation, staff development budget, etc., is an allowable staff development charge.
- 2) The Time Spent on Staff Development For Second-line or Above Supervision. The salary of a staff development second-line supervisor may be charged to staff development only if that person's total responsibility is staff development; otherwise, the entire salary should be charged to the non-staff development administrative salary area.

3) The Time Spent by Clerical Support Staff

That portion of the salary for clerical staff that corresponds with the time spent in direct support of the staff development office is allowable.

d. Salaries/Stipends of Trainees are Allowable for:

- 1) Time Spent by CWD Staff in Full-time Training. The salaries of those eligibility workers or those staff preparing to become eligibility workers who are in training/educational leave for four or more consecutive weeks and the salaries

of those social services staff in training/educational leave for eight or more consecutive weeks may be charged to staff development. While in training, these staff may have no assigned agency duties.

B. OPERATING COSTS - DFA 325.2, GROUP IV (2)

1. Staff Development Agency Overhead - the following costs may be direct charged as staff development overhead costs:
  - a. staff development travel, per diem, and books for bonafide staff development trainers, administrators, and supervisors detailed to the staff development office.
  - b. rental of training space separate and apart from the CWD.
2. Trainee Costs Other than Salaries - The following costs may be direct charged as staff development operating costs:
  - a. Education expenses (tuition and books) for CWD trainees and providers in full or part-time training.
  - b. Per Diem for all trainees (ex. providers) in full-time training for one or more consecutive weeks, for all full-time students preparing for CWD employment (except summer school students in social services training).

NOTE: Per diem for attendance at meetings/conferences, e.g., APWA, CWDA, is not a bonafide staff development cost.

- c. Travel is an allowable staff development cost for those trainees in full-time training for one or more consecutive weeks, for all full-time students preparing for CWD employment (except summer students in social services training), for foster parent trainees serving Title XX clients, and for individual contracted service providers in training for five or more consecutive days.

NOTE: Travel associated with attending meetings/conferences, e.g., APWA, CWDA, is not a bonafide staff development cost.

C. PURCHASE OF SERVICE - DFA 325.2, GROUP IV (3)

1. Costs for Outside Experts/Consultants are Allowable for:
  - a. Developing and/or providing CWD training. That portion of an outside expert/consultant's salary/fringe benefit, travel, and per diem associated with developing or providing special CWD training, through contract with the CWD, may be charged to staff development as a Purchase of Service cost.

2. Costs for Provider Agency Staff Development Personnel (excluding foster care providers) are Allowable for:
  - a. Developing/providing training to CWD-contracted direct service providers. That portion of a contracted agency's salary, benefits, travel, per diem, and support staff associated with training Title XX direct service providers is allowable if a separate contract exists between the CWD for this training and if the costs for training are not included in the contract which provides for the delivery of social services.
3. Costs for Educational Institutions are Allowable for:
  - a. Developing and/or providing CWD training. That portion of an accredited educational institution's salaries/fringe benefits, travel, per diem, clerical assistance, teaching material, and indirect costs are allowable staff development costs providing costs are incurred/billed in accordance with 45 CFR 228 Subpart H, 45 CFR 205.202, FMC 74-4, FMC 73-8, and 45 CFR 74, Subpart G.

## PART II: STAFF DEVELOPMENT - ALLOCATING TIME

### A. TIME STUDY REQUIREMENTS

#### 1. General Limitations:

Trainers, their first-line supervisors and non-supervisory staff development administrators (e.g., training coordinators) must complete the monthly staff development time study, DFA 50, if they meet the following requirements:

- a. The person must be under the supervision of a full-time staff development officer while performing staff development activities. Those counties who do not have a full-time staff development officer may, for purposes of charging time/costs, consider part-time staff to be supervised by the Chief, DSS Training Bureau and therefore charge time on the DFA 50, if the training program is developed and conducted in accordance with MPP Divisions 14 and 34, and,
- b. Must be detailed to the staff development office on an ongoing basis with the continuing responsibility to perform specific staff development activities. While the assignment to the staff development office can be made on a less than full-time basis, the responsibility for performing staff development activities must last for more than four consecutive weeks, e.g., must be part of a person's normal job function/description for more than four weeks.

Clerical staff and trainees will not complete the DFA 50. They will, however, have to maintain memo time studies should they also support nonstaff development units. Second-line and above staff development supervisors will not time study.

2. Specific Instructions - DFA 50

Bona fide staff development personnel should record time to the following areas:

a. Social Services - Include Time Spent:

- 1) By trainers when actually providing services training.
- 2) By first-line staff development supervisors for that time actually spent supervising services trainers.
- 3) By trainers, first-line supervisors, and nonsupervisory staff development administrators on activities that can be assigned directly and wholly to social services, e.g., course preparation for service-specific training.

b. Eligibility - Include Time Spent:

- 1) By trainers when actually providing eligibility training.
- 2) By first-line staff development supervisors for that time actually spent supervising trainers.
- 3) By trainers, first-line supervisors, and non-supervisory staff development administrators on activities that can be assigned directly and wholly to eligibility, e.g., course preparation for eligibility-specific training.

c. Generic Staff Development - Include Time Spent:

- 1) By bona fide trainers, first-line staff development supervisors and nonsupervisory staff development administrative personnel for staff development administrative activities that cannot be assigned to either services or eligibility. These activities include, but are not limited to, planning, needs assessment, course design, monitoring, evaluation, and staff development budget.
- 2) By trainers and their first-line staff development supervisors for training that cannot be specifically assigned to either eligibility or services, e.g., supervising techniques, affirmative action training.

d. Sick Leave/Vacation

- 1) Indicate time spent on sick leave and/or vacation.

e. Nonstaff Development - Include Time Spent:

- 1) By trainers, first-line staff development supervisors, and staff development administrators that is not allowable staff development time, e.g., eligibility or social services casework/supervision.

PART III: STAFF DEVELOPMENT - COST ALLOCATION

Currently, allocable staff development costs, e.g., all staff development costs excluding direct trainee salaries/benefits, are first allocated to either social services, eligibility, or general welfare administration on the DFA 325.2A, Group VIII, C, based on time study ratios developed from the DFA 50. Next, general welfare administration costs are distributed to either social services or eligibility based on the proportion of staff receiving either social services or eligibility training. Finally, allowable trainee costs are charged directly to function.

Effective July 1, 1979, trainee counts will no longer be used on the administrative expense claim as the basis for distributing any portion of staff development costs. Instead, all staff development costs, except those personal service salaries/benefits (trainee) directly charged to function, will simply be allocated based on the proportion of trainer time spent directly in support of services and eligibility. This process will occur on the renumbered staff development modification, the DFA 325.4. A simplified illustration of this process is provided below:

DFA 325.4 - Example

<u>Training Categories</u>	<u>Hours</u>	<u>Ratio to Subtotal</u>	<u>Allocable Costs</u>	<u>Direct Trainee Costs</u>	<u>Total</u>
Social Services	40	.40	\$ 4,000	\$250	\$ 4,250
Eligibility	60	.60	6,000	500	6,500
Subtotal	100	1.00	XXXX	XXXX	XXXX
Generic Staff Dev.	15	XXXX	XXXX	XXXX	XXXX
Grand Total	115	XXXX	\$10,000	\$750	\$10,750